

IN THE UNITED STATES DISTRICT COURT FOR  
THE MIDDLE DISTRICT OF ALABAMA

RECEIVED

2006 JUN -2 A 10: 03

DEBRA P. JACKETT, CLK  
U.S. DISTRICT COURT  
MIDDLE DISTRICT ALACalvin Brooks, 137190  
Full name and prison number  
of plaintiff(s)

v.

CIVIL ACTION NO. 2:06cv499-MHT  
(To be supplied by Clerk of  
U.S. District Court)Tyrone Barnett  
Gwendolyn Mosley  
LT. Bryant, Mr. Mitchell  
Sgt. Woods, Col. Gavin  
Sgt. Logan, Off. Drake  
Name of person(s) who violated  
your constitutional rights.  
(List the names of all the  
persons.)

## DEMAND FOR JURY TRIAL

## I. PREVIOUS LAWSUITS

- A. Have you begun other lawsuits in state or federal court dealing with the same or similar facts involved in this action? YES ( ) NO ( ☒ )
- B. Have you begun other lawsuits in state or federal court relating to your imprisonment? YES ( ☒ ) NO ( )
- C. If your answer to A or B is yes, describe each lawsuit in the space below. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, using the same outline.)

## 1. Parties to this previous lawsuit:

Plaintiff(s) Calvin BrooksDefendant(s) Officer Temple, et al.,I have filed over 40 cases.

2. Court (if federal court, name the district; if state court, name the county) U.S. District

Court.

2

3. Docket number I don't know all the numbers
4. Name of judge to whom case was assigned I've had  
all of you at one time or another.
5. Disposition (for example: Was the case dismissed? Was it appealed? Is it still pending?) SOME  
Pending, some dismissed
6. Approximate date of filing lawsuit many
7. Approximate date of disposition many

II. PLACE OF PRESENT CONFINEMENT EASTERNING CORR. FAX.

PLACE OR INSTITUTION WHERE INCIDENT OCCURRED 9 DORM,  
SHIFT OFFICE and 62 DORM.

III. NAME AND ADDRESS OF INDIVIDUAL(S) YOU ALLEGE VIOLATED YOUR CONSTITUTIONAL RIGHTS.

NAME	ADDRESS
1. TYTONE BARNOW	P.O. Box 16 Cllo, 21.36017
2. Gwendolyn Mosley,	"
3. LT. BRYANT	"
4. SGT. Woods	"
5. SGT. Logan	"
6. BRIAN Mitchell	"

IV. THE DATE UPON WHICH SAID VIOLATION OCCURRED SEPT. 14, 2004  
MARCH 30, 2005. APRIL 5, 2005. APRIL 15, 2006

V. STATE BRIEFLY THE GROUNDS ON WHICH YOU BASE YOUR ALLEGATION THAT YOUR CONSTITUTIONAL RIGHTS ARE BEING VIOLATED:

GROUND ONE: TAMPERING WITH UNITED STATES  
MAIL.

3

STATE BRIEFLY THE FACTS WHICH SUPPORT THIS GROUND. (State as best you can the time, place and manner and person involved.)

MS. Gwendolyn Mosley, has been stealing my mail and giving it to D.O.C. officials. She took some legal documents that resulted in me being beat up and placed in segregation.

GROUND TWO: RETALIATION FOR FILING A COMPLAINT IN STATE + FEDERAL COURTS.


SUPPORTING FACTS: MYSELF, JAMES ROBINSON, AND OTHER INMATES DISCOVERED CRIMINAL ACTS GOING AT THE INMATE LAW LIBRARY AND WHEN WE COMPLAINED WE WAS PLACED IN LOCK UP. I WAS HIT ABOUT COMPLAINING ABOUT THE DEFEADANTS TAKING MY LEGAL FILES

GROUND THREE: EXCESSIVE FORCE.

SUPPORTING FACTS: EXCESSIVE FORCE, ATTEMPTED MURDER AND RETALIATING AGAINST A WITNESS IN A FEDERAL COURT PROCEEDING.

VI. STATE BRIEFLY EXACTLY WHAT YOU WANT THE COURT TO DO FOR YOU. MAKE NO LEGAL ARGUMENT. CITE NO CASES OR STATUTES.


I SEEK A JUDGEMENT ON THE MERITS  
AND THAT THIS CASE BE INVESTIGATED  
BY THE F.B.I. 300,000. IN LOST WAGES  
A TRIAL BY JURY ON ALL CLAIMS.

  
Signature of plaintiff(s)

I declare under penalty of perjury that the foregoing is true and correct.

EXECUTED on

6/1-8-06  
(Date)

  
Signature of plaintiff(s)

5

**THE DEFENDANTS DID USE EXCESSIVE FORCE TO TAKE THE LEGAL DOCUMENTS THAT WAS IN THE POSSESSION OF THE PLAINTIFF IN ORDER TO HIDE CRIMES COMMITTED BY THE LEGAL DIVISION STAFF AT EASTERLING CORRECTIONAL FACILITY.**

---

The plaintiff states that the material evidence will show that on 5th day of April, 2005. Inmate Calvin Brooks and James Robinson, was in the process of assisting inmate Brian Lindsey, in a civil case here at the Easterling Correctional Facility, when we discovered a series of crimes being committed by the law library staff and was seemingly condoned by the law library supervisor and Lt. Bryant.

The Defendants Warden Gwendolyn Mosley, Assistant Warden Jones, Lt. Bryant and COI. Gavin, has developed a policy that states that inmates cannot review, assist or have in their possession. Other inmates legal papers. Also, the policy states that if an inmate do not have an institutional job, trade school or drug program. He cannot use the law library.

The plaintiff states that on several dates, he and Ulas Black, James Robinson, and other inmates was ran out of the library for no valid reason. They state that their library clerks are the only ones that can have other inmates legal work in their possession.

On April 5, 2005, the plaintiff calvin brooks received some legal papers from his brother, which showed that officers with the staff here at Easterling had been notarizing forged documents filed by inmate Eddie Lyles, and other inmate law clerks. This information came to the mail room and Ms. Mosley, gave the same to Lt. Bryant who in turn saw that he and Gavin, was about to be arrested for the crimes they was assisting Eddie Lyles and other in doing.

At about 4:00 pm. calvin brooks was tricked to go to the shift office where officer gavin, lt. bryant, sgt. woods, sgt. logal, lt. wilson, was waiting. The plaintiff brooks was forced to go back to dorm 9 and while there the defendant used force to take his legal papers and falsely claimed that the petitioner had violated rule number 70, unauthorized possession of another inmates property. All it was, was some legal papers that was given to him to look over. The plaintiff and robinson was placed in segregation.

On April 6, 2005, the plaintiff. brooks was taken to the Captain's office and he told said captain, what had happened and it was shown that the plaintiff had done nothing wrong.

The plaintiff calvin brooks, will state for the court that he has been the victim of these unlawful attacks by the staff at this facility and they always buy their way out of court. It seems to me that the court see that they are going to stop until they kill the plaintiff.

In Brooks v Moats, cv-01-466, and cv-01-1061. The evidence showed that Inmate Jimmy Smiley, attacked the plaintiff calvin brooks. It was also shown that the defendant Mosley, Brown falsified a report. In Brooks v Morris, it was shown that the staff at easterling unlawfully attacked the plaintiff and got away with that too. In Brooks v Temple, again. the evidence showed that the plaintiff was attacked by the staff here at easterling . At this very date. A writ of habeas corpus, is or should be. Concerning the attack against the plaintiff. This case was transferred from the united states district court for the southern district of alabama. cited as Brooks v Culliver. cv-03-1180 .

So the question now is. How many times do it take"?

#### CLAIM TWO

**TAMPERING WITH UNITED STATES MAIL BY *warden mosley*, LT. BRYANT AND COI. GAVIN.**

The plaintiff will state that the evidence before the court will show that on the 5th. day of april 2005, he received some legal papers that was down loaded off the internet, in the case of Brian lendsey v Cooley, Prison Health services, cv-04-302-11. These documents showed COI. Gavin, had assisted inmate Eddie Lyles in a plot to use perjured affidavits, forged affidavits, fraudulent medical reports, identity theft of three attorneys in mobile and birmingham, alabama. This information showed that money was being sent to people who was connected to gavin and Lt. Bryant.

When *warden mosley*, saw these documents. She removed them from a letter sent to the plaintiff by his brother Curtis Brooks and gave them to Lt. Bryant and COI. Gavin. Its well known that the mail room clerk here at easterling take inmates mail and her and warden mosely, dont like what it says. She will not allow the inmate to have the same. If it is evidence that will show crimes committed by her and staff, the inmate is generally beaten, placed in lock up, the letter is submitted to the legal division for review and distruction.

On April 6, 2005, I was called from the Captain's office and asked what was going on. I admit that the Captain was the only who seem to have any professionalism about the situation. He asked me what I had to do with anything. I stated that I had some inmates legal papers, classification review papers and some papers had came to me from my brother, that related to a case in the united states district court. I explained to him what those papers were and how officer Gavin, Lt. Bryant came by having them. I told him that the mailroom clerk had got them and gave them to the defendants.

The law in the united states is clear that department of corrections officials do not have the authority to steal inmates legal mail or legal papers. The defendants Lt. Bryant, Officer Gavin and *Sgt. Woods* intentionally stole material evidence that was involved in a pending case before this court and was evidence in a case filed by the plaintiffs calvin brooks. and james robinson.

The plaintiff states that **the first** amendment of the united states constitution gives him the absolute right to access to the courts. In this case, that access was denied when the defendants entered into a plot to deny the plaintiffs access to the courts by taking all evidence that showed their involvement in the crimes of inmate Eddie Lyles. The defendant *LT. Bryant*, had no reason or authority to take legal materials that was sent to the plaintiff by his brother and give the same to anyone other than the plaintiff. If it was contraband she should have turned it over to I & I for criminal prosecution.

The plaintiff states that as of this date. The defendants has not returned the papers they took. The defendants took, a complaint filed to the united states attorney's office requesting an investigation into the criminal acts of the defendants. They also took letters to attorneys who's names they were using as well as false medical persons. Based on these acts by the staff, it was proof that they had a hand in all this.



9

## PRISONER ABUSE IN VIOLATION OF LAW.

The Plaintiff alleges that the defendants agreed to engage in an act of abuse of him by maliciously, fraudulently, willfully and in bad faith acted beyond their authority when they attempted to shut the plaintiff up about a conspiracy between the defendants and two inmates, who were forging the names of Federal Judges of this court, the names of attorneys and doctors.

The plaintiff alleges that the evidence will show that the defendants to-wit Gwendolyn Mosley, Lt. Willie Bryant, Sgt. Woods, Sgt. Logan, Lt. Wilson and Officer Brian Gavin. Devise a plan to attack the plaintiff for his part in advising Inmate Ulas Black, Brian Lindsey and others inmates in complaining about the fraud being committed by the defendants herein.

The defendant filed a false incident report which stated that on the 5th. day of April 2005, the plaintiff and inmate James Robinson, conspired to have inmate John Darrington, pay 200. dollars to them to be sent to a Freddy Glenn. The Plaintiff has never talked to Freddy Glenn nor did the plaintiff tell John Darrington, to pay anyone anything. The defendants only used this false claim in order to raid the plaintiff's legal files and take information that is being used in the case of Brooks v. Collier, et.al. DC-0 - (U.S.D.C. Md. Ala. 2005). and the case of Brooks v. Mosley, Campbell, and Whaley. CV-05 - 6/9/2 (Montgomery county circuit court 2005).

The appellant states that the defendants assaulted him without cause and literally robbed him of legal documents that was evidence in these court proceedings as well as money receipts that was to be used to obtain compensation from van rides while he was at Elba work release. The Plaintiff filed a complaint to both warden Mosley, warden K. Jones and Lt. Bryant, concerning this act and they all sided with the defendants.

The 8th. amendment of the United States Constitution protects inmates from the abuse of people like the defendants. If the plaintiff had violated Alabama Department of Corrections rules, he would have had a disciplinary to show for it. The defendants cannot be immune from crimes they committed by the use of their badges. The defendants do not have the authority to abuse inmates under state and federal law. The policy at Easterling which authorizes officers to sell contraband to inmates, assist them in committing crimes and punishing those who report the same is not a valid policy and is due to be discontinued.

It's clear that Commissioner Donal Campbell, cannot control Gwendolyn Mosley and her gang of thieves, robbers, racketeers, prostitutes, and drug dealers. Since the commissioner cannot control these criminals, this court needs to enter a judgement against them and close the crime infested war camp down once and for all.



9

CLAIM 4

THE DEFENDANTS ARE VIOLATING THE PLAINTIFF'S AND ALL OTHER INMATES AT THE EASTERLING CORRECTIONAL FACILITY, RIGHTS AGAINST CRUEL AND UNUSUAL PUNISHMENT. BY UNLAWFULLY CONDUCTING ILLEGAL EXPERIMENTS ON THEM WITHOUT THEIR WRITTEN CONSENT IN VIOLATION OF THE EIGHTH AMENDMENT OF THE UNITED STATES CONSTITUTION.

---

The plaintiff states that the evidence will show that On the 14th. day of Sept. 2004, he was transferred to the Easterling Correctional facility in Clon, Alabama for the purpose of an illegal experiment.

The Defendants to-wit Gwendolyn Mosley, Kenneth Jones, Mr. Davenport, Brian Mitchell, ~~Comm. J. Jones~~, Tyrone Barrows, Sandra Hayes, has developed a policy of mental brain washing by forcing inmates to a drug program governed by inmates with Rape convictions, Murders and other crimes committed by persons who are mentally unfit to teach anyone anything.

The Defendant are also using mental attacks on inmates ability to determine right and wrong. In classification proceedings, inmates are forced to said hearing. Upon being forced there. The defendants invent false charges in their files to prevent them from leaving Easterling

The results are to see how long it will take for an inmate to lose his temper and attack someone. The results of such mental tampering has resulted in constant fights, stabbings, and other incidents that makes inmates at Easterling time bombs upon being released from prison. The Plaintiff states that each time he goes to a progress review. The defendant intentionally use an alleged life sentence for an resent escape second degree that resulted in the plaintiff receiving a life sentence for back in June 8, 1988. The problem is. The Plaintiff has never received a life sentence for an escape or even have a resent escape.

The Defendants also send officer to the Chow hall with orders to take food off inmates trays. On Many Occasions the plaintiff has had Officer Drake and Officer Wells, Jr. to take food off his tray and try to provoke the plaintiff to say something in order to justify the constant beatings that take place here at this facility. Since these acts denies the plaintiff of basic needs, the plaintiff has stated a valid claim.

CLAIM 5

DELIBERATE INDIFFERENCE TO A SERIOUS MEDICAL NEED BY FAILING TO CONDUCT SURGERY FOR SWELLINGS ON THE PLAINTIFF'S FACE.

The Plaintiff states that on the 5th. day of Aug.2005, he reported to the health care unit for treatment for a large sist that had grown on his face.The plaintiff has a long history of these infections and has been treated for the same for many years.The plaintiff reported to the health care unit and saw Nurse Bush, who interviewed the plaintiff and placed him on the list to see the defendant Dr.Darbouze.Upon, obtaining this appointment, said defendant prescribed anti-biotic pills and placed the plaintiff on the list to have the sist removed.

When the plaintiff reported to the health care facility for such surgery, Nurse bush stated that the Doctor has reset your appointment.By that time, the sist had grown so large that the plaintiff's face was swollen so bad, the officers ordered him to the Shift Office and questioned him about who had hit him and who he had been fighting.After the pain got so bad, the plaintiff had to take a razor blade and preform his own surgery to keep the sist from growing into his eyes and causing blindness.

On the 2nd. day of Feb.2006, the plaintiff reported to the health care unit and talked to Nurse Floyd, who did the plaintiff chronic care.The plaintiff reported to her that he had another sist that has been there for weeks and no one will treat it.The plaintiff has signed up for sick call and was given pills and set for an appointment to have it removed.When the plaintiff asked to see the doctor about removing the sist, Nurse Floyd stated that he will have to again sign up for sick call so that they can receive the three dollars co-payments.

When the plaintiff ask why he had to sign up for the same treatment he was already supposed to get.The defendant Nurse Floyd stated." This is Warden Mosley's policy, she wants us to make you all pay each time you get anything from over here".On many occations, the plaintiff has had to do his own surgery for sist that has swell so bad he could not see due to they cover his eyes.

In alleging a diliberate indifference claim, a plaintiff must allege and prove that the defendants actions was so grossly improper that a lay person would know the treatment was inadequate.see. Hamn v Decalb County, \_\_F.2d.\_\_(11th. cir.\_\_\_).also see estelle v Gamble, \_\_L.ed.2d.\_\_(19\_\_\_).

This is not a case where there is a difference of opinion between the medical staff and the plaintiff.This is a case where the Defendants to-wit.Gwendolyn Mosley,Dr.Darbouze,Nurse Floyd,Nurse Bush,Nurse McKinnon,Nurse McKissic, has intentionall refused to treat an obvious medical need that can cause serious results.The type sist the plaintiff have can spread through out his body and get into the blood stream and cause serious injury or even death.This is known to the defendants.The defendants has killed over 20 Inmates since the plaintiff has been here with their sorryness,unprofessional conduct,and lack of proper care and treatment to inmates.

For the forgoing reasons, the plaintiff life is in danger as well as all inmates here at this facility.The staff is more interested in the co-payment than they are inmates life.

C/3.M 6

MASS MURDER THROUGH INADEQUATE TREATMENT AND SELLING INMATE BODY PARTS.

---

The plaintiff alleges that the evidence will show that the defendant Gwendolyn Mosley,Dr.darbouze,Nurse McKissic,Nurse Floyd,Nurse Bush, are *made* in my so many inmates with their intentional neglect of treatment and their sorryness that inmates herein are subjected to die of minor illnesses due to stupidity.The plaintiff states that when you go to pill call herein, the nurses such as Nurse Bush, Nurse Mc.Kissic, have such a lack of respect for the lives of inmates, they will stright out deny the inmates their medication for the most stupid reasons.

When inmates go to sick call, the nurses usually deny the inmates the right to see a doctor,they pretend to be doctors, they prescribe medications that are not for the problem the inmates are having and often give the inmates the wrong medication at pill call.Inmates who complain are placed in segragation, beat up by Officers at the diretions of Mosley or some other staff member.And lied on and given a disciplinary.

In the last two months, several inmates have died from what appear to be expearmental medications. Further the inmates at this facility are breaking out with bumps, blisters and other illness from the contaminated water that has been shown to be unfit for human drinking.

In order to keep this death trap open so that the defendants can enjoy their murder spree, the defendants lie and tell the inmates that there is nothing wrong at this facility. The evidence shows that inmates are dropping like flys from what ever they are doing to us. In cases like this, when a large number of people are dying from an unknown sourse, the F.I.B. is to be notified. In alabama, the state controls all State and Federal Judges and are said to even be paying them to look the other way. (which dont take very much in alabama).

Under the Prison Litigation reform ACT. An Inmate who is claimed to be a three striker, he still have the right to seek redress when the evidence shows that his life is in danger as in this case.

### Claim 7

#### ATTEMPTERD MURDER OF THE PLAINTIFF BY THE DEFENDANTS

The Plaintiff states that the defendants Gwendolyn Mosley, has a policy that orders the defendants to take prescribed medication from inmates and place them in what she calls a "HOT DORM 6(A)" This is the dorm they place inmates in that file civil actions in the courts for other inmates, themselves and seek judicial review from the wrongs of the staff herein.

On the 5th. day of April 2005, the Defendants Lt. Willie Bryant, Lt. Wilson, Sgt. Woods, Sgt. Logan. Officer Brian Gavin, made up a plot to place the plaintiff in 6(A) segregation dorm for assisting other inmates with their legal work. The inmate that was the subject of this was Inmate Brian Lindsey, who was being lied to about an attorney was assisting INmate Eddie Lyles and Officer Brian gavin to file a civil action for him and his mother. When the plaintiff obtained this information. The defendants forced him to 6-a dorm and took his blood pressure medication.

## CLAIM ( 8 ).

THE DEFENDANTS ARE USING THEIR OFFICE FOR THEIR OWN PERSONAL GAIN IN VIOLATION OF STATE ETHICS LAWS AND THE CONSTITUTIONAL RIGHTS OF THE INMATES IN THEIR CUSTODY.

The evidence submitted with this complaint will show without a doubt that the ~~staff~~ here at this facility are bigger criminals than the inmates who are in their custody. The evidence will also show that Commissioner Donal Campbell, cannot supervise the staff at this facility because warden Mosley will not allow him to do so.

When, the ~~commissioner~~ comes to this facility. warden Mosley, is so close to him at times you would think he's going to step on her. Who, knows what she do to keep him from firing the whole staff of criminals.

At this facility, everybody has their own method of using their position for ~~profit~~. As to the crime bill sap program and the smoking ban which is only a ban to those who cannot pay \$50.00 to \$1000.00 dollars for a pack of cigarettes. Those who can. The staff make sure that the inmate have money orders sent to certain addresses and ~~the inmates~~ are allowed to sale the same to inmates without being punished thereof.

## PROFITING FROM THE CIGARETTE SALES

The Plaintiff states that it is a constant problem with fights, arguments, and stealing from other inmates in order to buy cigarettes from the Officers here at easterling. Its said that out of all cigarettes sold herein. Warden Mosley, receives half of the \$50.. to \$100.00 dollars made off a pack of cigarettes, Buglar tobacco. The smoking ban at easterling is just a rumor. In this case, the sale of cigarettes is used to force inmates in a Crime Bill S.A.P. program. The policy is if you take the program, the defendant will in turn send you to a facility where you can smoke.

When inmates ask for a transfer from this "WAR CAMP" the response from Warden Mosley is always. You're just trying to get somewhere so You can Smoke. With this complaint, I send several Cigarettes to this court to show that there is no ban on cigarttes for all but just those who can pay her price or agree to defraud the Government for her profit by taking this "FAKE ASS CRIME BILL S.A.P. program." In My response to the fraudulent motion to dismiss. I will submit the names of all Officers who are her salepersons and the Inmates who are selling the same to the population.

CLAIM (9)  
~~ANTI-INMATE~~ LITIGATION POLICY:

The Defendant to-wit Warden Gwendolyn Mosley, Warden Davenport, Lt. Willie Bryant and the Staff at the Easterling has developed an "Anti-Inmate Litigation Policy" in which states that any Inmate who assist any other Inmate by reviewing his or her legal papers, file any actions in any courts against the Staff or D.O.C. Officials in Montgomery, Alabama. "will be placed in Segregation (6-A-Hot Dorm). Also if that inmate is on prescribed medication as is the Plaintiff. The inmates medication is to be taken and not returned thereto.

The Plaintiff states that he is not claiming a right to assist anyone in litigating anything. Most of the Inmates at this facility are so afraid of these Terrorist cloth with a badge and the tax payers money to bribe judges, F.B.I. Agent I&I Investigators and Barbour County officials to not investigate, seek criminal prosecutions or stop the crime spree at this facility. The Plaintiff states that he is on four type of medications, all of which if not taken as he should. Can and will result in his death.

At Easterling, taking inmate's medication who are on prescribed medication for life threatening illnesses are customary. Every Dorm that is designed to get inmates away from violent, stupid, disrespectful, masterbaters and Gays. Are controlled by rapist, Murders, child abusers, Inmate Police who have more power than the real police. The end results are that Inmates therein are forced to take some type drug, alcohol, sex, N/A or A/A program as a condition to be in there.

Inmates like the Plaintiff, Inmate Gray, Inmate Thomas, and Inmate Body, just to name a few who has been victims of this policy. Can clearly state with personal knowledge that this policy exist. To show that the policy do in fact exist. The plaintiff submits some of the many orders from the Alabama court of criminal appeals who has took this policy under consideration and ruled in favor of the plaintiff who drafted the motion for many inmates herein and obtained a ruling from said court finding that the same is being used at Easterling by Warden Mosley and her staff. see. Brooks v State, Cr- 04-1926, Gray v State, Cr-\_\_\_\_\_, Thomas v State, Cr- 04-0886, Body v State, Cr-\_\_\_\_\_, Blount v State, Cr- 05-1093 Brown v State, Cr-\_\_\_\_\_.

Since this policy can result in the plaintiff being beaten, hurt or even Killed by the defendant if they are told that he has assisted any other inmate with their legal actions. The plaintiff has stated a valid claim for relief.



15

CLAIM 10 :

THE DEFENDANT TO-WIT PRISON HEALTH SERVICES AND ITS STAFF ARE UNLAWFULLY SELLING INMATE BODY PARTS FOR PROFIT IN VIOLATION OF STATE AND FEDERAL LAWS:

---

The defendants prison health services and their past and present employees are selling Inmate body parts for profit. The defendants <sup>took</sup> over the sale of inmate body parts from all other health care providers who was doing the same. The plaintiff states that the evidence will show that Inmates are intentionally abandoned by health care providers so that they will die of minor illnesses. The Inmates are then taken to a Lab in Montgomery, ALabama where their bodies are stripped of all useful parts such as Hearts, Livers, Kidney, eyes, stem cells and other parts.

The defendants then sell these parts to over seas markets for millions and the Inmates families are unaware of this crime. The plaintiff states that when he was at other prisons in Alabama. He has seen Inmates who were killed by Knife fights, heart attacks, ran over by farm equipment, or other injuries that will not contaminate the body. These parts are removed prior to the body being turned over to the family and if the family do not claim the remains, some are even sold to labs all over the world. The Plaintiff has buried more empty caskets while at Limestone than he can count. At Easterling, in the last few months, over 25 INmates have died when their illnesses could have been treated in time.

The plaintiff alleges that the evidence will show that inmates at this facility ~~OR~~ any other in Alabama are not made aware of this policy and non are told that they are subjected to be allowed to die from minor injuries just so the state can market their body parts. Since this is a criminal act of which all inmates herein are subjected too. The plaintiff is in danger of the defendant crimes and even if he is transfered to another facility. The same take place therein under Prison health service.

CLAIM 11

THE DEFENDANT USES INTENTIONAL ACTS OF FRAUD TO INSTIGATE A FIGHT WITH INMATES SO THAT THEY CAN ASSAULT, BEAT AND HURT INMATES WHO OPPOSE THEIR WILLFUL ACTS OF FRAUD IN CLASSIFICATION PROCEEDINGS:.

---

The plaintiff states that Warden Gwendolyn Mosley, Warden davenport, Ms. Green, Ms, Hayes, Ms. Wilson, Mr. Tyrone Barrow, has entered into an agreement that in order to instigate inmates to fight or riot, they call inmates to classification and place lies in their files with the intent to instigate riots, fights between the staff and the inmates.



16

The evidence will show that every since March of 1990, it has been the policy at Easterling, that "IF WE CANT MAKE ANY MONEY OFF YOU, WE WILL NOT DO ANYTHING FOR YOU".

Under this policy, inmates who refuse to be fund raisers for the defendants are forced to classification proceedings before the defendants Ms.Hayes,Ms.Green,Ms. Wilson,Mr.Tyrone Barrow and Mr.Mitchell, who intentionally file false documents in the inmates files to instigate violence.The defendant Warden Mosley,Warden Davenport and other tell the Classification officials to file false documentss in the inmates files and do not send them to central review board for review and final orders because they will notice that the recommendations are based on fraud.

In the case of Douglas Stevenson, this Inmate is serving a sentence for possession of a forged instrument.The defendant has classed him as a sex offender and refuse to correct the same.In the case of sam Adams, this defendant is serving a sentence for property crimes and the defendants has unlawfully placed a conviction for an alleged escape from the state of florida.The state of florida has filed a letter to the defendants stating that the claims are not true and the defendants still refuse to correct their records.(the defendant sam Adams refused to take crime bill s.a.p.)In this case of the plaintiff.The plaintiff has been to two progress reviews herein and at both. The defendants Gwendolyn Mosley, Tyrone Barrows,Brian Mitchell,Ms.Green and Warden Davenport has increased the plaintiff sentences for escape to a life sentence for a recent escape that the plaintiff dont know anything about.

When the plaintiff ask the defendant to show him where he received a recent escape and a life sentence for the same.Warden Davenport shouted"Get your dam hands off my files"They all though that was funny.He then ordered the plaintiff to unfold his arms and to leave .The plaintiff will state that he has received two court orders from the Houston county and henry county courts for the defendants to discontinue imposing sentences that either have expired or are completed in classification proceedings.The defendants also will not allow the plaintiff to be considered for parole because they will not allow the institutional parole officer have his files and as a result, parole is aways denied.

Since these acts are directed at the plaintiff to instigate violence from the staff against the plaintiff.The plaintiff's safty is in danger from the ~~eye~~ criminals with a badge.

CLAIM 12

THE DEFENDANT ARE VIOLATING THE PLAINTIFF'S RIGHTS BY FORCING HIM AND ALL OTHER INMATES AT THE EASTERLING CORRECTIONAL FACILITY TO SURRENDER TO MEDICAL TREATMENT WITHOUT PROPER MEDICAL EVALUATION BY A PROFESSIONAL HEALTH CARE PROVIDER.

---

The Plaintiff alleges that the evidence will show that the defendants to-wit Warden Gwendolyn Mosley, Brian Mitchell, Ms. Green, Ms. Wilson, Ms. Hayes, Tyrone Barrow and Officer Wagner are violating the Plaintiff and all other inmates at this facility constitutional right under the 8th. and 14th. amendment of the united states constitution, by forcing the plaintiff to attend a drug treatment program that is supervised by Inmates who are not health care providers. The Plaintiff also states that as of March 1, 2006. The defendant Warden Mosley, Capt. J. Knox, has established a policy in which inmates are to provide medical services to population.

A memo was handed out on said date stating that any inmate with medical training is to sign up for such therein. At this facility. The health care officials such as Nurse Bush, Nurse McKinnon, Nurse McKissick are so sorry, they have a emergency truck, but when inmates have emergency situation. They send two untrained inmates with a steel bed on wheels to pick them up and bring them to the H.C.U. If the inmate is suffering from a serious illness, they usually die on the way to the H.C.U. or right after they get while waiting for the nurses to come off their break.

The evidence will show that upon arriving at easterling, Mr. Brian Mitchell, automatically placing inmates on a list to attend a crime bill sapp program. AT no time prior to such placement does he nor any other health care provider ever evaluate the inmates to see if they have any need for such treatment. Also, classification officials are told by Warden Mosley, to Black mail inmates to sign up for the program or they will not leave easterling. The Harzards of this forced medical treatment and the physiological effects this medical treatment is having on most inmates who attend the program, The plaintiff wish the court can see the way they act when they are released from the dorm.

The effects of this torture and Nazi concentration Camp Type" program is nothing more than a get rich plan of the defendant and their mentally ill supervisors. The inmates who are release from this program go out and right off the bat, start killing people, using drugs, (some of which never used drugs until they took the program). and dont stay out of prison a hot second. The program that the defendants here at easterling is nothing like the one used by the rest of the D.O.C.

The drug treatment specialist are nothnig more than officer of the D.O.C. The facts of this case will show how dangerous playing with the human mind can be. When the inmates in the crime bill program are released for anything, feeding, yard call, church or anything. The inmates run out the dorm, yelling and screaming like mad men. They fight anyone for any reason and they are removed from the program and placed in 6(A). This is another one of Mosley's mind bending dorms. The plaintiff dont know if this is a project sponsored by the C.I.A. or Ms. Mosley and her friends in Montgomery, are playing Dr. Frankenstine or Adolf Hitler.

IN AN ATTEMPT TO STOP THE PLAINTIFF FROM EXPOSING THE STATE OFFICIALS OF ALABAMA. THIS COURT AND ITS JUDGES CAME UP WITH A PLAN TO BAR THE PLAINTIFF FROM FILING VALID COMPLAINTS UNLESS HIS LIFE WAS IN DANGER.

---

The Plaintiff states that this court will not allow the plaintiff to file any actions in said court unless the plaintiff is about to be murdered by the defendants. In this case, the plaintiff has shown that on many occations the defendants Lt. Bryant, Officer gavin, and Warden Mosley, ~~took~~ the plaintiff's blood pressure *medically*. Further, the plaintiff states that the court record shows that on many occations, officers at this facility was told to beat the plaintiff in retaliation for his legal actions in the state and federal courts. The defendants will lie about anything and have no fear of the court punishing them because they state that their lawyers pay the judges to rule in their favor.

Since I dont have that kind of money, I only seek free justice.

DEFENDANTS IN THIS ACTION

GWENDOLYN MOSLEY.....200 WALLACE DRIVE CLIO,ALABAMA 36017

GOV.BOB RILEY.....600 DEXTER AVE. ROOM 104 MONTGOMERY, ALABAMA 36130

COMM.ALLEN P.O.BOX 301501 MONTGOMERY, ALABAMA 36130

TYRONE BARROW.....P.O.BOX 10 CLIO,ALABAMA 36017

LT.WILLIE BRYANT....P.O.BOX 10 CLIO,ALABAMA 36017

SGT.PHILLIP EDWARD WOODS...P.O.BOX 10 CLIO,ALABAMA 36017

SGT.SHAWN LOGAN...P.O.BOX 10 CLIO,ALABAMA 36017

LT.WILSON...P.O.BOX 10 CLIO,ALABAMA 36017

SANDRA HAYES...P.O.BOX 10 CLIO,ALABAMA 36017

MS.T.GREEN..P.O.BOX 10 CLIO,ALABAMA 36107

MS.WILSON..P.O.BOX 10 CLIO,ALABAMA 36017

BRIAN MITCHELL..P.O.BOX 10 CLIO,ALABAMA 36017

Officer Drake..P.O.BOX 10 CLIO,ALABAMA 36017

OFFICER WELLS,JR...P.O.BOX 10 CLIO,ALABAMA 36017

BRIAN GAVIN..P.O.BOX 10 CLIO,ALABAMA 36017

WARDEN DAVENPORT..P.O.BOX 10 CLIO,ALABAMA 36017

JAMES GARDNER..P.O.DRAWER 2568 MOBILE, ALABAMA 36652

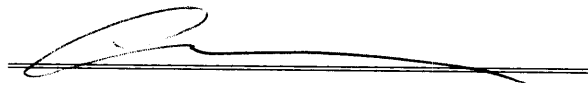
Dr.Darbouze..P.O.BOX 10 CLIO,ALABAMA 36017

NURSE P.McKISSIC..P.O.BOX 10 CLIO,ALABAMA 36017

NURSE BUSH..P.O.BOX 10 CLIO,ALABAMA 36017

NURSE FLOYD..P.O.BOX 10 CLIO,ALABAMA 36017

The above named defendants had a personal involvement in this cause and the plaintiff has stated a valid claim against them.

  
A handwritten signature in black ink, appearing to read 'Calvin B. Brooks', is written over two horizontal lines.

CALVIN B.BROOKS, 137190